

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HAPAG-LLOYD AKTIENGESELLSCHAFT,

Plaintiff,

-against-

U.S. OIL TRADING LLC, O.W. BUNKER
GERMANY GMBH, O.W. BUNKER & TRADING
A/S, O.W. BUNKER USA, INC., ING BANK N.V.,
CRÉDIT AGRICOLE CIB.

Defendants.

14 Civ. 9949 (VEC)

**PLAINTIFF HAPAG-LLOYD’S
RESPONSE TO DEFENDANT USOT’S
FIRST REQUESTS FOR ADMISSIONS**

Plaintiff Hapag-Lloyd Aktiengesellschaft (hereinafter “Hapag”) responds to Defendant U.S. Oil Trading LLC’s (“USOT”) First Requests for Admissions as follows:

GENERAL COMMENTS

Hapag objects to the introductory instructions to the extent they seek to impose obligations beyond those required by the Federal Rules of Civil Procedure and Local Rules and will respond in accordance with the applicable rules. Hapag also objects to the extent Hapag is being asked to admit or deny legal conclusions to be drawn from the facts and/or the determination of ultimate or material issues, as such requests are not proper. *See, e.g., Ross v. Shah*, 2015 U.S. Dist. LEXIS 102315, 35-36 (N.D.N.Y Aug. 5, 2015) (discovery request seeking admission of case’s fundamental legal issue is improper) (citing, *inter alia*, *Lakehead Pipe Line Co. v. Am. Home Assur. Co.*, 177 F.R.D. 454, 458 (D. Minn. 1997) (requests improper when they ask party to “ratify what are, in essence, the legal conclusions that the Defendants have attached

to the operative facts of the case.”); *Coach, Inc. v. Horizon Trading USA Inc.*, 908 F. Supp. 2d 426, 432 (S.D.N.Y. 2012) (request for admission of legal conclusion to be drawn from facts is improper); *Lane No. 1 v. Lane Masters Bowling Inc.*, 2011 U.S. Dist. LEXIS 29231 (N.D.N.Y. Mar. 22, 2011).

The following responses are made solely for the purposes of this action. Each response is subject to all objections as to relevance, materiality, and admissibility, and to any and all objections on any ground that would require exclusion of any response if it were introduced in court.

No incidental or implied admissions are intended by these responses. The fact that Hapag has objected or responded to any Request shall: (i) not be deemed an admission that Hapag accepts or admits the existence of any facts set forth or assumed by such Request or that such objection or response constitutes admissible evidence and (ii) is not intended to and shall not be construed to be a waiver by Hapag of any part of any objection to any Request.

The responses and objections are made on the basis of information and writings currently available to and located by Hapag upon reasonable investigation. In addition, to the extent pleadings, documents provided in discovery, responses to interrogatories, or testimony given at depositions provides supplemental or further responses or information in relation to this demand, the responses herein shall be deemed supplemented and/or amended. Hapag expressly reserve the right to modify, revise, supplement, or amend its responses as it may deem appropriate.

Request No. 1: On September 27, 2014, the Master of the M/V SANTA ROBERTA, G.K.S. Chaudhary, sent an email to HLAG's "RQMT-SECTION4" requesting that bunkers be delivered to the vessel at the port of Tacoma, Washington on or about October 8, 2014.

Response: Denied as written. On September 27, 2014, the vessel sent a Bunker Requisition form via email to Hapag setting forth, *inter alia*, the port at which delivery of bunkers was requested as well as the M/V SANTA ROBERTA's scheduled arrival and departure from that port. Thereafter Hapag evaluated the request to determine its appropriateness and ultimately made the decision to order bunkers from OW Germany for delivery at Tacoma.

Request No. 2: On September 30, 2014, HLAG's Lukas Gaus sent an email to the Master of the M/V SANTA ROBERTA confirming receipt of the Master's request for bunkers.

Response: Denied as written. Admit that Hapag's Lukas Gaus sent an email to the M/V SANTA ROBERTA on September 30, 2014, acknowledging receipt of the "bunker requirement" and confirming that Hapag had decided to order the bunkers for delivery at Tacoma, Washington.

Request No. 3: On September 30, 2014, HLAG's Lukas Gaus sent an email requesting price quotes for the delivery of bunkers to the M/V SANTA ROBERTA at the port of Tacoma, Washington on October 9, 2014, and attached HLAG's Bunker Fuels Inquiry thereto.

Response: Admit that on September 30, 2014, Lukas Gaus of Hapag sent an email to various bunker traders requesting bids for a quantity of bunkers to be supplied to the M/V SANTA ROBERTA at the port of Tacoma, Washington, on or about October 9, 2015; USOT was not sent such email.

Request No. 4: On or about October 1, 2014, HLAG entered into an agreement with O.W. Bunker Germany GmbH ("O.W. Germany") to arrange for the delivery of bunkers to the M/V SANTA ROBERTA at the port of Tacoma, Washington on or about October 9, 2014.

Response: Denied. Hapag entered into an agreement with OW Germany, whereby Hapag ordered and purchased bunkers from OW Germany for delivery to the M/V SANTA ROBERTA at Tacoma.

Request No. 5: On October 1, 2014, O.W. Germany issued a sales order confirmation to HLAG which names USOT as the supplier of the subject delivery of bunkers to the M/V SANTA ROBERTA at the port of Tacoma, Washington on or about October 9, 2014.

Response: Admit that the Sales Order Confirmation issued by OW Germany on October 1, 2014, identifies several pieces of information including that Hapag's terms and conditions applied and makes reference to USOT being the "supplier."

Request No. 6: The sales order confirmation issued by O.W. Germany to HLAG for the subject delivery of bunkers to the M/V SANTA ROBERTA states in relevant part: "HALO GTC2007 shall apply."

Response: Admit that the Sales Order Confirmation issued by OW Germany states, among other things, that "HALO GTC2007 shall apply."

Request No. 7: On October 1, 2014, HLAG issued a bunker purchase order for the subject delivery of bunkers to the M/V SANTA ROBERTA which names USOT as the supplier.

Response: Admit that the Bunker Purchase Order issued by Hapag on October 1, 2014, makes reference to USOT being the “supplier”, but this reference was only for the purposes of quality control, logistics and security.

Request No. 8: On or about October 6, 2014, USOT and O.W. Bunker & Trading A/S ("O.W. Denmark") entered into an agreement for the sale and delivery of approximately 2,700 metric tons of bunkers to be delivered to the M/V SANTA ROBERTA at the port of Tacoma, Washington on or about October 9, 2014.

Response: Hapag can neither admit nor deny this request, as it was not a party to the negotiations, if any, between USOT and OW Denmark and has no personal knowledge related thereto.

Request No. 9: On October 9, 2014, USOT delivered approximately 2,700.11 metric tons of bunkers to the M/V SANTA ROBERTA at the port of Tacoma, Washington.

Response: Admit.

Request No. 10: The M/V SANTA ROBERTA's Chief Engineer accepted and acknowledged the subject delivery of bunkers by USOT to the vessel by stamping USOT's marine bunker receipt for the delivery on October 9, 2014.

Response: Hapag objects to this request as it improperly seeks an admission or denial with respect to a legal conclusion and/or material/ultimate issue to be decided at trial with respect to the delivery receipt. Subject to and without waiver of this objection, Hapag admits that the Chief Engineer signed the “Marine Bunker Receipt for Delivery to Vessel.”

Request No. 11: On or about October 9, 2014, USOT issued its Invoice No. BWTD 83441 to O.W. Denmark in the amount of \$1,481,860.28 for the delivery of bunkers to the M/V SANTA ROBERTA at the port of Tacoma, Washington on October 9, 2014.

Response: Hapag can neither admit nor deny this request, as it was not a party to the negotiations, if any, between USOT and OW Denmark and has no personal knowledge related thereto.

Request No. 12: Pursuant to USOT's Invoice No. BWTD 83441, payment was due to USOT on or before November 8, 2014.

Response: Hapag can neither admit nor deny this request, as it was not a party to the negotiations, if any, between USOT and OW Denmark and has no personal knowledge related thereto.

Request No. 13: USOT has not been paid by the M/V SANTA ROBERTA or O.W. Denmark for the amounts due under USOT's Invoice No. BWTD 83441 despite repeated demands by USOT for payment.

Response: Hapag can neither admit nor deny this request insofar as it relates to the actions of OW Denmark. With respect to the M/V SANTA ROBERTA, Hapag denies that there is any obligation on the M/V SANTA ROBERTA's part to pay the invoice but nevertheless Hapag has deposited security with the Court with respect to that obligation if it is determined to exist and has thus satisfied any obligation that might exist.

Request No. 14: USOT possesses a maritime lien against the M/V SANTA ROBERTA for the full amount due under USOT's Invoice No. BWTD 83441, plus interest and costs.

Response: Hapag objects to this request as improperly calling for an admission with respect to a legal conclusion. Subject to and without waiver of this objection, Hapag denies that USOT has any lien against the M/V SANTA ROBERTA.

Request No. 15: On October 8, 2014, the Master of the M/V SEASPAN HAMBURG, Devjeet Basu, and/or the Chief Engineer of the vessel, Vitaliy Kryzhnyi, sent an email to HLAG's "RQMT-SECTION1" requesting that bunkers be delivered to the vessel at the port of Tacoma, Washington on or about October 16, 2014.

Response: Denied as written. On October 8, 2014, the vessel sent a Bunker Requisition form via email to Hapag setting forth, *inter alia*, the port at which delivery of bunkers was requested as well as the M/V SEASPAN HAMBURG's scheduled arrival and departure from that port. Thereafter Hapag evaluated the request to determine its appropriateness and ultimately made the decision to order bunkers from OW Germany for delivery at Tacoma.

Request No. 16: On October 9, 2014, HLAG's Lukas Gaus sent an email requesting price quotes for the delivery of bunkers to the M/V SEASPAN HAMBURG at the port of Tacoma, Washington on October 16, 2014, and attached HLAG's Bunker Fuels Inquiry thereto.

Response: Admit that on October 9, 2014, Lukas Gaus of Hapag sent an email to various bunker traders requesting bids for a quantity of bunkers to be supplied to the M/V SEASPAN

HAMBURG at the port of Tacoma, Washington on or about October 16, 2015; USOT was not sent such email.

Request No. 17: On or about October 10, 2014, HLAG entered into an agreement with O.W. Germany to arrange for the delivery of bunkers to the M/V SEASPAN HAMBURG at the port of Tacoma, Washington on or about October 16, 2014.

Response: Denied. Hapag entered into an agreement with OW Germany, whereby Hapag ordered and purchased bunkers from OW Germany for delivery to the M/V SEASPAN HAMBURG at Tacoma.

Request No. 18: On October 10, 2014, O.W. Germany issued a sales order confirmation to HLAG which names USOT as the supplier of the subject delivery of bunkers to the M/V SEASPAN HAMBURG at the port of Tacoma, Washington on or about October 16, 2014.

Response: Admit that the Sales Order Confirmation issued by OW Germany on October 10, 2014, identifies several pieces of information including that Hapag's terms and conditions applied and makes reference to USOT being the "supplier."

Request No. 19: The sales order confirmation issued by O.W. Germany to HLAG for the subject delivery of bunkers to the M/V SEASPAN HAMBURG states in relevant part: "HALO GTC2007 shall apply."

Response: Admit that the Sales Order Confirmation issued by OW Germany states, among other things, that "HALO GTC2007 shall apply."

Request No. 20: On October 10, 2014, HLAG issued a bunker purchase order for the subject delivery of bunkers to the M/V SEASPAN HAMBURG which names USOT as the supplier.

Response: Admit that the Bunker Purchase Order issued by Hapag on October 10, 2014, makes reference to USOT being the “supplier”, but this reference was only for the purposes of quality control, logistics and security.

Request No. 21: On or about October 13, 2014, USOT and O.W. Denmark entered into an agreement for the sale and delivery of approximately 2,900 metric tons of bunkers to be delivered to the M/V SEASPAN HAMBURG at the port of Tacoma, Washington on or about October 16, 2014.

Response: Hapag can neither admit nor deny this request, as it was not a party to the negotiations, if any, between USOT and OW Denmark and has no personal knowledge related thereto.

Request No. 22: On October 16, 2014, USOT delivered approximately 2,900.21 metric tons of bunkers to the M/V SEASPAN HAMBURG at the port of Tacoma, Washington.

Response: Admit.

Request No. 23: The M/V SEASPAN HAMBURG's Chief Engineer accepted and acknowledged the subject delivery of bunkers by USOT to the vessel by stamping USOT's marine bunker receipt for the delivery on October 16, 2014.

Response: Hapag objects to this request as it improperly seeks an admission or denial with respect to a legal conclusion and/or material/ultimate issue to be decided at trial with respect to the delivery receipt. Subject to and without waiver of this objection, Hapag admits that the Chief Engineer signed the “Marine Bunker Receipt for Delivery to Vessel.”

Request No. 24: On or about October 16, 2014, USOT issued its Invoice No. BWTD 83450 to O.W. Denmark in the amount of \$1,507,408.99 for the delivery of bunkers to the M/V SEASPAN HAMBURG at the port of Tacoma, Washington on October 16, 2014.

Response: Hapag can neither admit nor deny this request, as it was not a party to the negotiations, if any, between USOT and OW Denmark and has no personal knowledge related thereto.

Request No. 25: Pursuant to USOT's Invoice No. BWTD 83450, payment was due to USOT on or before November 17, 2014.

Response: Hapag can neither admit nor deny this request, as it was not a party to the negotiations, if any, between USOT and OW Denmark and has no personal knowledge related thereto.

Request No. 26: USOT has not been paid by the M/V SEASPAN HAMBURG or O.W. Denmark for the amount due under USOT's Invoice No. BWTD 83450 despite repeated demands by USOT for payment.

Response: Hapag can neither admit nor deny this request insofar as it relates to the actions of OW Denmark. With respect to the M/V SEASPAN HAMBURG, Hapag denies that there is any obligation on the M/V SEASPAN HAMBURG's part to pay the invoice but nevertheless Hapag has deposited security with the Court with respect to that obligation if it is determined to exist and has thus satisfied any obligation that might exist.

Request No. 27: USOT possesses a maritime lien against the M/V SEASPAN HAMBURG for the full amount due under USOT's Invoice No. BWTD 83450, plus interest and costs.

Response: Hapag objects to this request as improperly calling for an admission with respect to a legal conclusion. Subject to and without waiver of this objection, Hapag denies that USOT has any lien against the M/V SEASPAN HAMBURG.

Request No. 28: On October 20, 2014, the Master of the M/V SOFIA EXPRESS, Christian Gründel, sent an email to HLAG's "RQMT-SECTION3" requesting that bunkers be delivered to the vessel at the port of Tacoma, Washington on or about October 29, 2014.

Response: Denied as written. On October 20, 2014, the vessel sent a Bunker Requisition form via email to Hapag setting forth, *inter alia*, the port at which delivery of bunkers was requested as well as the M/V SOFIA EXPRESS' scheduled arrival and departure from that port. Thereafter Hapag evaluated the request to determine its appropriateness and ultimately made the decision to order bunkers from OW Germany for delivery at Tacoma.

Request No. 29: On or about October 23, 2014, HLAG entered into an agreement with O.W. Germany to arrange for the delivery of bunkers to the M/V SOFIA EXPRESS at the port of Tacoma, Washington on or about October 29, 2014.

Response: Denied. Hapag entered into an agreement with OW Germany, whereby Hapag ordered and purchased bunkers from OW Germany for delivery to the M/V SOFIA EXPRESS at Tacoma.

Request No. 30: On or about October 23, 2014, O.W. Germany issued a sales order confirmation to HLAG which names USOT as the supplier of the subject delivery of bunkers to the M/V SOFIA EXPRESS at the port of Tacoma, Washington on or about October 29, 2014.

Response: Admit that the Sales Order Confirmation issued by OW Germany on October 23, 2014, identifies several pieces of information including that Hapag's terms and conditions applied and makes reference to USOT being the "supplier."

Request No. 31: The sales order confirmation issued by O.W. Germany to HLAG for the subject delivery of bunkers to the M/V SOFIA EXPRESS states in relevant part: "HALO GTC2007 shall apply."

Response: Admit that the Sales Order Confirmation issued by OW Germany states, among other things, that "HALO GTC2007 shall apply."

Request No. 32: On October 23, 2014, HLAG issued a bunker purchase order for the subject delivery of bunkers to the M/V SOFIA EXPRESS which names USOT as the supplier.

Response: Admit that the Bunker Purchase Order issued by Hapag on October 23, 2014, makes reference to USOT being the “supplier”, but this reference was only for the purposes of quality control, logistics and security.

Request No. 33: On or about October 28, 2014, USOT and O.W. Denmark entered into an agreement for the sale and delivery of approximately 2,700 metric tons of bunkers to be delivered to the M/V SOFIA EXPRESS at the port of Tacoma, Washington on or about October 29, 2014.

Response: Hapag can neither admit nor deny this request, as it was not a party to the negotiations, if any, between USOT and OW Denmark and has no personal knowledge related thereto.

Request No. 34: On October 29, 2014, USOT delivered approximately 2,680.22 metric tons of bunkers to the M/V SOFIA EXPRESS at the port of Tacoma, Washington.

Response: Admit.

Request No. 35: The M/V SOFIA EXPRESS's Master accepted and acknowledged the subject delivery of bunkers by USOT to the vessel by stamping USOT's marine bunker receipt for the delivery on October 29, 2014.

Response: Hapag objects to this request as it improperly seeks an admission or denial with respect to a legal conclusion and/or material/ultimate issue to be decided at trial with respect to the delivery receipt. Subject to and without waiver of this objection, Hapag admits that

the Master signed the “Marine Bunker Receipt for Delivery to Vessel” indicating that he “signed as receipt for volume and delivery-temperature only. Specifications subject to verification by analysis of vessel’s retained sample.”

Request No. 36: On or about October 29, 2014, USOT issued its Invoice No. BWTD 83463 to O.W. Denmark in the amount of \$1,315,507.80 for the delivery of bunkers to the M/V SOFIA EXPRESS at the port of Tacoma, Washington on October 29, 2014.

Response: Hapag can neither admit nor deny this request, as it was not a party to the negotiations, if any, between USOT and OW Denmark and has no personal knowledge related thereto.

Request No. 37: Pursuant to USOT's Invoice No. BWTD 83463, payment was due to USOT on or before November 28, 2014.

Response: Hapag can neither admit nor deny this request, as it was not a party to the negotiations, if any, between USOT and OW Denmark and has no knowledge related thereto.

Request No. 38: USOT has not been paid by the M/V SOFIA EXPRESS or O.W. Denmark for the amounts due under USOT's Invoice No. BWTD 83463 despite repeated demands by USOT for payment.

Response: Hapag can neither admit nor deny this request insofar as it relates to the actions of OW Denmark. With respect to the M/V SOFIA EXPRESS, Hapag denies that there is any obligation on the M/V SOFIA EXPRESS’ part to pay the invoice but nevertheless Hapag has

deposited security with the Court with respect to that obligation if it is determined to exist and has thus satisfied any obligation that might exist.

Request No. 39: USOT possesses a maritime lien against the M/V SOFIA EXPRESS for the full amount due under USOT's Invoice No. BWTD 83463, plus interest and costs.

Response: Hapag objects to this request as improperly calling for an admission with respect to a legal conclusion. Subject to and without waiver of this objection, Hapag denies that USOT has any lien against the M/V SOFIA EXPRESS.

Request No. 40: USOT's claims for maritime liens against the M/V SANTA ROBERTA, M/V SEASPAN HAMBURG and M/V SOFIA EXPRESS (collectively, the "Vessels") *in rem* are governed by the Commercial Instruments and Maritime Lien Act, 46 U.S.C. §§ 31301, *et seq.*

Response: Hapag objects to this request as improperly calling for an admission with respect to a legal conclusion. Subject to and without waiver of this objection, Hapag denies that USOT has any lien against the Vessels whether under the referenced Act or otherwise.

Request No. 41: USOT has not waived its maritime liens against the Vessels as a matter of law.

Response: Hapag objects to this request as improperly calling for an admission with respect to a legal conclusion. Subject to and without waiver of this objection, Hapag denies that USOT has any lien against the Vessels.

Request No. 42: USOT has suffered damages as a result of the failure of the Vessels to pay the amount owed for the bunkers provided to the Vessels by USOT.

Response: Hapag objects to this request as improperly calling for an admission with respect to a legal conclusion and/or ultimate/material issue in the case. Furthermore, Hapag denies that there is any obligation on the Vessels' part to pay USOT, but nevertheless Hapag has deposited security with the Court with respect to that obligation if it is determined to exist.

Request No. 43: Norton Lilly International, Inc. ("NLI") acted as local agent for the Vessels at the port of Tacoma, Washington during the subject deliveries of bunkers to the Vessels by USOT in October 2014.

Response: Admit that NLI acted as the Vessels' local agent for the subject port calls with the limited responsibilities that attend such an appointment.

Request No. 44: HLAG's contract with O.W. Germany for the subject deliveries of bunkers to the Vessels is subject to German law and arbitration.

Response: Hapag objects to this request as improperly calling for an admission with respect to a legal conclusion and/or ultimate/material issue in the case.

Request No. 45: The following documents, attached as exhibits hereto, are true and accurate copies of the original of such documents:

<u>Exhibit</u>	<u>Document</u>
A	Email from Master of the M/V SANTA ROBERTA to "RQMT-SECTION4" dated September 27, 2014. (HPL-USOT 00045)
B	Email from Lukas Gaus to Master of the M/V SANTA ROBERTA dated September 30, 2014. (HPL-USOT 00051)
C	Email from Lukas Gaus to unknown recipients dated September 30, 2014. (HPL-USOT 00053)
D	O.W. Germany's sales order confirmation dated October 1, 2014. (HPL-USOT 00034-36)
E	HLAG's purchase order for the subject delivery of bunkers to the M/V SANTA ROBERTA. (HPL-USOT 00031-33)
F	USOT's sales authorization and sales confirmation for the subject delivery to the M/V SANTA ROBERTA. (USOT 000108-09 and 112)
G	USOT's marine bunker receipt for the subject delivery to the M/V SANTA ROBERTA. (HPL-USOT 00086)
H	USOT's Invoice No. BWTD 83441. (HPL-USOT 00038)
I	Email from NLI to the Master of the M/V SANTA ROBERTA dated October 7, 2014. (NLI0047-49)
J	Emails between NLI and USOT dated October 1, 2014. (NLI0052)
K	Email from the Master and/or Chief Engineer of the M/V SEASPAN HAMBURG to "RQMT-SECTION1" dated October 8, 2014. (HPL-USOT 00042)
L	Email from Lukas Gaus to unknown recipients dated October 9, 2014. (HPL-USOT 00052)
M	O.W. Germany's sales order confirmation dated October 10, 2014. (HPL-USOT 00021-23)

N HLAG's purchase order for the subject delivery of bunkers to the M/V SEASPAN HAMBURG. (HPL-USOT 00018-20)

O USOT's sales authorization and sales confirmation for the subject delivery to the M/V SEASPAN HAMBURG. (USOT 000163-64 and 167

P USOT's marine bunker receipt for the subject delivery to the M/V SEASPAN HAMBURG (HPL-USOT 00025)

Q USOT's Invoice No. BWTD 83450. (HPL-USOT 00025)

R Email from NLI to the Master of the M/V SEASPAN HAMBURG dated October 15, 2014. (NLI0008-10)

S Emails between NLI and O.W. Bunker USA Inc. dated October 15, 2014. (NLI0015-16)

T Emails between NLI and USOT dated October 10 and 13, 2014. (NLI0011-14)

U Email from Master of the M/V SOFIA EXPRESS to "RQMT-SECTION3" dated October 20, 2014. (HPL-USOT 00043)

V HLAG's purchase order for the subject delivery of bunkers to the M/V SOFIA EXPRESS. (HPL-USOT 00058-60)

W USOT's sales authorization and sales confirmation for the subject delivery to the M/V SOFIA EXPRESS. (USOT 000053-54 and 57)

X USOT's marine bunker receipt for the subject delivery to the M/V SOFIA EXPRESS. (HPL-USOT 00083)

Y USOT's Invoice No. BWTD 83463. (HPL-USOT 00030)

Z Email from NLI to the Master of the M/V SOFIA EXPRESS dated October 28, 2014. (NLI0027-29)

AA Emails between NLI and USOT dated October 23, 27-28, 2014. (NLI0030-33)

BB Emails between NLI and O.W. Bunker USA Inc. dated October 27-28, 2014. (NLI0034-36)

Responses: With respect to the documents produced by Hapag (i.e., those bearing the HPL-USOT prefix), the request is admitted. With respect to the documents produced by other parties, Hapag can neither admit nor deny the request.

Dated: December 24, 2015

Respectfully Submitted,

/s/ Michael Fernandez

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that, on December 24, 2015, a true and correct copy of the captioned document was served via e-mail upon the following counsel:

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